1

LAW OFFICES OF J. DAVID NICK

E MAIL: jdavidnick@lawyer.com

345 FRANKLIN STREET

San Francisco, CA 94102 Telephone: (415) 552-4444 Facsimile: (415) 358-5897

Attorney for Defendant GOYKO KUBUROVICH

J. DAVID NICK, (California State Bar #157687)

3

4

5

7

8

10

11

12

14

15 16

17

18

19 20

21

22 23

24

2526

27

28

DENIED

DENIED

Judge Edward J. Davila

9/6/2019

DISTRICT OF

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA-SAN JOSE DIVISION

UNITED STATES OF AMERICA,) CASE NO.: CR 16-00373-EJD
Plaintiff,	DEFENDANT GOYKO KUBUROVICH'S OPPOSED EX PARTE REQUEST FOR
VS.	EXTENSION OF TIME TO SURRENDER [PROPOSED ORDER]
GOYKO KUBUROVICH et al.,	CURRENT SURRENDER DATE: 10-10-19 EXTENSION REQUESTED: 12-9-19.
Defendants.)

EX-PARTE REQUEST FOR ORDER EXTENDING TIME TO SURRENDER:

Defendant, **GOYKO KUBUROVICH**, hereby submits this EX PARTE MOTION TO EXTEND THE DATE DEFENDANT IS REQUIRED TO SURRENDER TO THE BUREAU OF PRISONS to commence his sentence. **The United States of America has indicated they OPPOSE this request**.

The current date defendant is required to surrender being October 10, 2019, defendant asks that date be extended to December 9, 2019. **The reasons offered for said extension include** that Mr. Kuburovich has a number of doctor appointments that require follow up likely into November. He has currently scheduled visits to see his cardiologist. Lastly, Mr. Kuburovich is aware that while confined he cannot run a business. The additional time would allow him to complete his final business projects which is necessary to fulfil financial obligations.

CONCLUSION Based on the foregoing reasons, Defendant respectfully request that he be given until December 9, 2019 to surrender to Lompoc Federal Prison Camp. DATED: August 28, 2019 J. DAVID NICK, ATTORNEY FOR DEFENDANT [PROPOSED] ORDER EXTENDING DATE TO SURRENDER Good Cause having been shown by the defendant's ex parte application, the Court grants the defendant an extension of time to surrender from the currently set date of October 10, 2019 to _____, 2019. Defendant's ex parte application is DENIED. So Ordered, United States District Judge